



## Pierce County

Public Works and Utilities

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### Environmental Services

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May 18, 2006  
WP53595

Ann Wessel  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504

Department of Ecology  
Water Quality Program  
MAY 19 2006

Subject: Pierce County's CWQMP

Dear Ms. Wessel:

Pierce County Water Programs is pleased to provide this draft Countywide Water Quality Monitoring Plan (CWQMP) for your review. The primary goal of the CWQMP is to provide information that will help improve the effectiveness and efficiency of our stormwater management program.

The CWQMP was prepared under our supervision by our consultant, Brown and Caldwell. We began work on the CWQMP in 2004 -- well before Ecology issued the draft of Phase I NPDES permit. Please note that Pierce County Water Programs' comments on the draft Phase I permit are being submitted under separate cover.

The CWQMP prescribes a comprehensive monitoring program that builds on the existing monitoring and research efforts of the County and other entities in our region. The plan calls for integrated biological, physical, and chemical monitoring to assess receiving water quality status and trends, and help evaluate the effectiveness of our stormwater management program in protecting beneficial uses. In addition, the monitoring program will provide near "real-time" data that can be used to quickly identify and address stormwater quality problems. The CWQMP also provides for monitoring to aid the development and implementation of TMDLs for water bodies in Pierce County's jurisdiction.

From a stormwater management perspective, we believe that the multi-faceted monitoring approach described in this CWQMP will provide more useful information than the stormwater discharge sampling prescribed in the draft NPDES permit. Our proposed monitoring program will address many more water bodies and locations than the approach proposed in the draft permit, and at lower cost. The CWQMP also provides for special studies to resolve issues identified during monitoring or to support other County initiatives. Therefore, we believe that our monitoring program

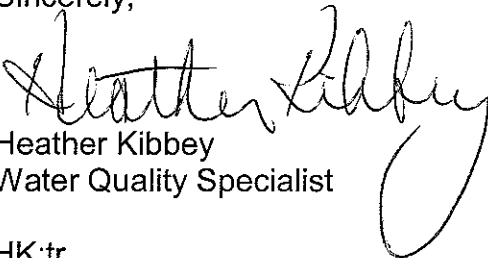


Ms. Wessel  
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will improve Pierce County's ability to reduce the discharge of stormwater pollutants to the maximum extent practicable, and satisfy the general intent of the NPDES permit.

Pierce County Water Programs is willing to work with Ecology to refine this CWQMP and obtain your concurrence that it meets the intent of the NPDES permit. Please contact us at 253-798-2725, if you would like to discuss.

Sincerely,

  
Heather Kibbey  
Water Quality Specialist

HK:tr

Enclosure

cc: file

This file contains multiple, linked worksheets to derive and compare planning level cost estimates for the draft Countywide Water Quality Monitoring Plan (CWQMP, Brown and Caldwell, Feb '06, revised May '06) and the Draft NPDES MS4 Stormwater Permit (Ecology, 2/15/06). These estimates are subject to the assumptions and factors listed.

The "Pierce Co" sheet summarizes and compares costs of the two programs.

The "Pierce Co details" sheet contains labor effort estimates for the CWQMP LTT and TD monitoring.

The "MS4 summary" sheet summarizes cost estimates developed in the two other sheets "outfalls" and "BMP Effectiveness" which contain itemized costs for each of these 2 respective MS4 monitoring requirements.

There are two levels of CWQMP cost estimates: one for the 9 LTT stations and another for the 25 LTT station option.

There are two levels of MS4 BMP Effectiveness monitoring: one for the required 35 sample sets, and another for 20 samples, a likely practical limitation given the apparent 2 year sampling period dictated by permit submittal schedule for the QAPP and the final report.

Labor costs can be changed to examine alternative scenarios and the spreadsheets will re-calculate; values of \$50/hr are assumed for the CWQMP and \$80/hr for the MS4 permit work.

Other variables are also included in the calculations and can be changed, including QC sample rate (assumed 20%), labor hours per sampling event, false start and failure rates, equipment costs, etc.

Developed by Brown and Caldwell, March 2006, revised May 2006 (revisions in green shading) to:

- 1) increase field labor needs for B-IBI and physical channel monitoring under the LTT program
- 2) add lab costs for B-IBI sample analysis (\$110 per sample, totaling \$330 for 3 replicates at each site)
- 3) increase MS4 permit outfall sampling costs for sediment parameters due to Fact Sheet pg 51 Table.

**Annual Costs for Pierce County Monitoring Program Options**  
*non-recurring costs preceded by "NR"*

labor rates can be varied below and for itemized costs on linked "labor detail" worksheet  
 REVISED 5/18/06

Draft CWQMP (2/14/06)	Costs per Program Element		basis/comment
	LTT (single station)	TD (station pairs)	
# stations	9	4	
labor rate	\$ 50	\$ 50	
B-IBI	\$ 10,000	\$ -	vary labor rate as needed, \$50 assumes County FTE rate
channel	\$ 12,600	\$ 5,600	1 visit per year, 2 sites per day+ann data synth
in situ bioassays	\$ 18,000	\$ 11,000	1 visit per year, 1 site per day+ann data synth
continuous mon	\$ -	\$ 44,000	2 visits per year, 5hrs per site+data synth
reporting	\$ 10,000	\$ 15,000	15 visits/year, 4 hrs per site +monthly data synth
NR cont mon eqpt	\$ -	\$ 48,000	annual reports
NR bioassay eqpt	\$ 1,000	\$ 1,000	eqpt: \$4K purchase, \$2K installed per location (doubled for Tier 2 pair)
NR bioassay validate	\$ 75,000	\$ -	may have to replace eqpt periodically, but is low cost
first year	\$ 126,600	\$ 124,600	one time effort, consultant supported; \$50K validation+ \$25K training
successive years	\$ 50,600	\$ 75,600	
annual hrs per FTE	510	760	
5 year cost	\$ 329,000	\$ 427,000	
Grand Total	\$ 756,000	\$ 756,000	0.64 FTE, for 2 FTEs over 5 years

These estimates for CWQMP  
 1) do not include EDMS, travel costs, inflation  
 2) assumes all field work using teams of 2 personnel

Increase CWQMP	Costs per Program Element		basis/comment
	LTT (single station)	TD (station pairs)	
# stations	25	4	
labor rate	\$ 50	\$ 50	
B-IBI	\$ 26,000	\$ -	alternate to cover 25 stations in Tier 1
channel	\$ 35,000	\$ 5,600	vary labor rate as needed, \$50 assumes County FTE rate
in situ bioassays	\$ 50,000	\$ 11,000	1 visit per year, 2 sites per day+ann data synth
continuous mon	\$ -	\$ 44,000	1 visit per year, 1 site per day+ann data synth
reporting	\$ 10,000	\$ 15,000	2 visits per year, 5hrs per site+data synth
NR cont mon eqpt	\$ -	\$ 48,000	15 visits/year, 4 hrs per site +monthly data synth
NR bioassay eqpt	\$ 3,000	\$ 1,000	annual reports
NR bioassay validate	\$ 75,000	\$ -	eqpt: \$4K purchase, \$2K installed per location (doubled for pair)
first year	\$ 199,000	\$ 124,600	may have to replace eqpt periodically, but is low cost
successive years	\$ 121,000	\$ 75,600	one time effort, consultant supported; \$50K validation+ \$25K training
annual hrs per FTE	1,210	760	
5 year cost	\$ 683,000	\$ 427,000	
Grand Total	\$ 1,110,000	\$ 1,110,000	0.99 FTE, for 2 FTEs over 5 years

this option same as above except uses 25 Tier 1 stations

Draft MS4 permit, 2/15/06		Outfalls (S8.A)	BMPs (S8.C)	BMPs (S8.C)	Comment/assumption
scenario	minimum rqmt	3	max practical	8	
min # stations	15	20	20	35	min # events as inferred in permit
QC rate	20%	20%	20%	20%	high QC for organics, clean metals & overall complexity, at least in first year
costs below are	annual costs	total program costs			
analytical	\$ 81,000	\$ 99,000	\$ 174,000		current ARI lab rates, \$600/sample assumed for specific pest/herbicides
analytical QC	\$ 33,000	\$ 40,000	\$ 70,000		QC blanks & dupes at same cost per sample
labor	\$ 75,000	\$ 431,000	\$ 755,000		using consultants at \$80/hr, with 1 false start and 1 failure per quarter
sediments	\$ 24,000		in above		3 sed samples/year, 3 days/sample for 2 consultants at 3 outfalls
acute WET	\$ 2,000		na		assumes WET labor concurrent with other sampling, but takes planning
flow control BMP	na	\$ 67,000	\$ 67,000		separate equipment, labor and reporting
reporting	\$ 40,000	\$ 32,000	\$ 32,000		1 annual report per year
MR equipment	\$ 30,000	\$ 80,000	\$ 80,000		\$10K per auto sampling station (sampler, flowmeter, housing), installed
MR QAPP	\$ 40,000	\$ 40,000	\$ 40,000		one time cost, approval required, assume one QAPP per program element
first year	\$ 325,000	\$ 454,500	\$ 669,000		
successive year(s)	\$ 255,000	\$ 334,500	\$ 549,000		
5 year cost	\$ 1,345,000	\$ 789,000	\$ 1,218,000		
<b>Grand Total</b>	<b>\$ 2,140,000</b>	<b>max practical (i.e. 20 pairs of BMP effectiveness samples)</b>	<b>\$ 2,570,000</b>	<b>implied minimum (i.e. 35 pairs of BMP effectiveness samples)</b>	

Other assumptions for MS4 permit estimate:

1. BMP effectiveness: assume 2 year sampling program given permit schedule dictates
2. False starts (insuff rain/duration) and sampling failures (eqpt/human error) assumed to expend 1/2 of the labor needed for a successful event (3 days for team of 2)
3. For simplicity, sampling labor assumes same effort per event for outfall and BMP sampling: 3 days for team of 2, which includes storm tracking, mobilization, demobilization, etc. Assumes 3 outfalls and 4 BMPs (station pairs) to sample per event.
4. Assumes consultants used due to 24-7 availability needed to meet requirements
5. No other costs included for acute WET because permit does not specify acceptance (min survival) criteria, consequences or follow up (TIE) for toxic result, or if tests based on grab or composite (time or flow)
6. For QAPPs, requirement of "one per BMP" as permit states is probably unnecessary and a single QAPP should suffice for each program element (outfalls and BMPs).
7. minimum # sampling events as inferred in permit, but likely max of 20 would be practical limit for BMP effectiveness given apparent 2 year duration.

**Cost estimate for typical TMDL study  
for fecal coliforms  
using the MST approach**

**Scope assumptions**

	value	comment
study duration, yrs	1	
number of streams/subbasin	1	
number stations per stream/subbasin	6	
number stormflow sampling events per year	12	
number baseflow sampling events per year	6	
total # samples	108	
labor, man hours per sampling event (team of 2)	16	same for storm and baseflow events, assumes 1 8-hr day for team of 2 to sample 6 sites
labor rate	\$50	
goal for # MST isolates	800	\$90 County labor assumed \$50/hr, consultant labor assumed \$80/hr
cost per isolate	\$75	isolates (ribotyping) IEH laboratory (Mansour Samadpour)
E. coli test, cost per 3 replicates	\$75	need 3 replicates per sample to yield sufficient # of non-confluent colonies
ancillary parameters, cost per sample	\$325	total lab cost of \$400/sample including E. coli, and excluding MST isolates
hours for draft report	300	includes data review, validation and synthesis
hours for final report	100	one round of review and edits

Item	Cost		comment
	using County labor	using consultant labor	
QAPP	\$ 40,000	\$ 40,000	QAPP by consultant
supplies	\$ 5,000	\$ 5,000	
total sampling labor	\$ 14,400	\$ 25,920	
total MST	\$ 60,000	\$ 60,000	
total analytical	\$ 43,200	\$ 43,200	
draft report	\$ 15,000	\$ 27,000	
final report	\$ 5,000	\$ 9,000	
PM	\$ 18,260	\$ 21,012	10% PM rate
<b>total</b>	<b>\$ 201,000</b>	<b>\$ 232,000</b>	rounded up to nearest \$1K

scale up options	\$ 233,000	\$ 263,000	for 10 stations, 1 stream
	\$ 249,000	\$ 279,000	for 6 stations 2 streams
	\$ 312,000	\$ 343,000	for 10 stations 2 streams

**Labor Cost Summary of Feb 06 Draft CWQMP Long Term Trend (LTT) and Targeted Development (TD) Approaches**  
*[labor rate and other effort factors can be varied and summaries will re-calculate]*

Labor costs and hours per station per year using County labor at assumed rate

<b>LTT (single stations)</b>							comment
item	cost	hrs/yr	hrs/event	events/yr	# FTEs	rate	
BIBI sampling	\$ 400	8	4.0	1	2	\$ 50	doubled labor to 4 hrs/site (2 sites/day vs 4 sites/day)
BIBI data analysis	\$ 300	6	6.0	1	1	\$ 50	annual data synthesis (not reporting)
BIB sample analysis (3 reps)	\$ 330	7	6.6	1	1	\$ 50	Aquatic Biology Assoc, \$110/sample rep, for 3 reps=\$330
phys channel	\$ 800	16	8.0	1	2	\$ 50	doubled labor to 8 hrs/site (1 site/day vs 2 sites/day)
phys channel data analysis	\$ 600	12	12.0	1	1	\$ 50	annual data synthesis (not reporting)
in situ bioassay labor	\$ 1,000	20	5.0	2	2	\$ 50	2 visits per year, 5hrs per site for team of 2 FTEs
in situ bioassay data analysis	\$ 1,000	20	10.0	2	1	\$ 50	lab dupe, data capture, data synthesis
total per station per year	\$ 4,430	89					
note, in this portion:							
1) in-situ bioassay method validation/training not included							
2) equipment costs not included							
<b>TD (station pairs)</b>							comment
item	cost	hrs/yr	hrs/event	events/yr	# FTEs	rate	
continuous mon labor	\$ 6,000	120	4.0	15	2	\$ 50	weekly visit first month, then monthly: 4 hrs/station pair for 2 FTEs
continuous mon data analysis	\$ 4,800	96	8.0	12	1	\$ 50	monthly data synthesis and summary: 1 day effort per station pair
phys channel	\$ 800	16	8.0	1	2	\$ 50	doubled labor to 8 hrs/site (1 site/day vs 2 sites/day)
phys channel data analysis	\$ 600	12	12.0	1	1	\$ 50	annual data synthesis (not reporting)
in situ bioassay labor	\$ 1,600	32	8.0	2	2	\$ 50	2 visits per year, 8hrs per station pair for team of 2 FTEs
in situ bioassay data analysis	\$ 1,000	20	10.0	2	1	\$ 50	lab dupe, data capture, data synthesis
total per station pair per year	\$ 14,800	296					

**Cost Estimate Summary for Counties to meet MS4 Stormwater Monitoring Requirements (based on 2/15/06 draft permit)**  
*assumes independent option selected, also, Ports have different scope*  
 revised 5/18/06 to include cost of sediment analysis per Fact Sheet pg 51 Table

Program Element		analytical		labor cost		labor hrs		eqpt		Cost Element		Annual Report		Annual Report total	
S8.A										sediments		WET		QAPP	
<b>Outfall monitoring</b>															
per year		\$ 565,000		\$ 365,000		4,563		\$ 30,000		\$ 120,000		\$ 8,000		\$ 40,000	
program duration, yrs		\$ 113,000		\$ 73,000		913				\$ 24,000		\$ 1,500		\$ 40,000	
per outfall per year		\$ 38,000		\$ 25,000		304				\$ 8,000		\$ 500		\$ 13,333	
														\$ 85,000	

not including eqpt  
not including QAPP

Program Element		analytical		labor cost		labor hrs		eqpt		Cost Element		Annual Report		Annual Report total	
S8.C										flow control		QAPP			
<b>BMP Effectiveness</b>															
per event		\$ 99,000		\$ 431,000		5,388		\$ 80,000		\$ 67,000		\$ 40,000		\$ 16,000	
year 1		\$ 4,950		\$ 21,550		135									
year 2		\$ 49,500		\$ 215,500		2,694		\$ 80,000		\$ 33,500		\$ 40,000		\$ 8,000	
# events		20		\$ 215,500		2,694				\$ 33,500				\$ 16,000	
# sites		4													
program duration, yrs		2													
														\$ 430,000	
														\$ 749,000	
														\$ 320,000	

Program Element		not included													
S8.B															
<b>Program Effectiveness</b>															





Comparison of the two draft versions of permit requirements elements compared side by side, crosshatched where absent in one or the other draft version significant changes shaded gray

Draft 1 (5/16/05)

**Draft 2 (2/15/06) element/significant language**

56B	begin section	56C	begin section
	"comprehensive, long term"	1	"full scale field monitoring"
	characterize treatment BMPs		evaluate O&M plans
a	characterize Flow Reduction Strategies		
1	2 questions to be addressed		
	individual option	S8D.1	
	collaborative option	S8D.1	
	22 sites per (treatment) BMP	2	
	6 flow reduction strategies (overall among permittees)	S8C.3	
	do QAPP for each BMP and Q strategy	S8.C.1	
a.	use qualified staff or contractor		
	TAPE protocol for short det lines		
	test at BMPs listed (12)		
	all permittees		
	design criteria, similar to "manual		
(1)	Basic (5 public domain)		
(2)	Enhanced (5 public domain)		
(3)	Oil (in sand filter, CBI)		
ii.	prioritized list		
iii.	one Q strategy per City & County permittee (not Port)	S8.C.3	
iv.	provide staff assistance		
b.	no rights for "other special permittees"		
2	Program Dev., review and approval in 52 years	S8.E.1/2	
	QAPP review by ECV	S8.D.2	
	methods, req defined by permittee's QAPP		
Flow (rate, dur, vol)	all		
event wx info	all		
TSS	all		
PSD	all		
pH	all		
hard	all		
temperature	all		
TPH-DX & Gx	all		
sheen	all		
TR and diss Cu, Zn	all		
TR and diss As, Cd, all	all		
BNAS	all		
pesticides	all		
TN	all		
TP	all		
NOX	all		
Ortho-P	all		
BOD	all		
E. Coli	all		
Enterococcus	all		
Toxicity	all		
sediment sampling			
sediment testing			
1.	"framework for Ph II permittees"		
1.	adopted in ≤30 months		
k.	implemented in ≤36 months		
2	annual monitoring report by end of year, begin 2009	S8.E.1 ed; S8.F.C	

param cost source

**Cost Estimate for 2/15/06 Draft MS4 Permit Stormwater Monitoring for Treatment BMP Effectiveness (\$8.0)**

**Scope Narrative, per permittee**

- 4 BMP installations with a pair of auto samplers and flowmeters at each BMP inlet and outlet=8 monitoring stations.
- 1 flow control BMP (paired inlet/outlet continuous flow monitoring)
- full QAPP+TAPe for each BMP (thus, 2 QAPPs, but that is not necessary, so assume single QAPP)
- implement by end of year 2, sample ~2 years, submit final report by end of year 4
- assume min 20 events (up to 35 in ~2 years is unlikely achievable)
- false starts (good samples, bad events) and system failures (bad samples, good events) will be significant
- sediment samples of accumulated sediment in each BMP-permit text vague, assume bulk samples collected at 1/2 the stormwater sampling frequency, assume labor incidental to stormwater sampling

**Cost Estimate Factors & Assumptions**

# events 20 full analytical & labor, completed in 2 years  
 # false starts 8 1 per qtr, no analytical spent, but use 50% of event labor  
 # failures 8 1 per qtr, no analytical spent, but use 50% of event labor  
 QC rate 20% field eqpt blanks and dupes for all params  
 labor rate \$80 consultant supported  
 labor hrs per event per BMP sampling station pair 48 3 days for team of 2 (6 man days)  
 labor hrs per annual report per BMP family 50 (100 hours for program per year for 2 years)  
 labor hrs per final report per BMP family 100 (200 hours total for final report)  
 flow control labor 480 total hours over 2 years (12 man weeks) for single site for flow monitoring, data synthesis and evaluation

flow control labor													480		total hours over 2 years (12 man weeks) for single site for flow monitoring, data synthesis and evaluation	
BMP family	analytical	labor	total	false start	failure	QC analyt	analyt	labor	sediments	total	eqpt	ann report	reporting	total		
cost/event/BMP																
BASIC	\$ 850	\$ 3,840	\$ 5,540	\$ 1,920	\$ 1,920	\$ 3,400	\$ 20,400	\$ 107,520	\$ 4,300	\$ 132,220	\$ 20,000	\$ 4,000	\$ 8,000	\$ 320,440		
ENH	\$ 850	\$ 3,840	\$ 5,540	\$ 1,920	\$ 1,920	\$ 3,400	\$ 20,400	\$ 107,520	\$ 4,300	\$ 132,220	\$ 20,000	\$ 4,000	\$ 8,000	\$ 320,440		
Oil control	\$ 540	\$ 3,840	\$ 4,920	\$ 1,920	\$ 1,920	\$ 2,160	\$ 12,960	\$ 107,520	\$ 4,300	\$ 124,780	\$ 13,000	\$ 4,000	\$ 8,000	\$ 281,560		
subtotal for testing 2 installations of 2 BMPs (Basic+Enh)																
							\$ 98,800	\$ 430,080			\$ 80,000	\$ 16,000	\$ 16,000	\$ 640,880		

Flow Control			\$ 38,400			\$ 12,000	\$ 4,000	\$ 8,000	\$ 66,400					
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pick 2 of these 3 BMP families for program for total cost using consultants \$ 707,280 above at staff cost of \$50/hr \$ 513,600

Sediment Monitoring Portion	# samples	cost	source	method
grain size	10 ARI			assume sieve/hydroimeter
TVS	25 ARI			
TPH-DX	65 ARI			
Cl	35 ARI			GFAA
Pb	35 ARI			GFAA
Zn	30 ARI			ICP
TP	35 ARI			
digestion	20 ARI			not listed in permit but needed for total metals
TOC	45 ARI			
total	\$ 430			

field labor hours in above	5,856	per person	2,928	includes flow control labor
field labor days in above	732		366	
field labor months in above	37		18	
total reporting labor hours in above	400		\$ 32,000	
total annual report hours (2 annual reports)	200			
total final report hours	200			

this portion of the cost estimate does not include QAPP development does not include mileage, supplies and other CDC

item	type	approximate eqpt costs	comment
sample	ISCO	\$ 4,000	
area velocity		\$ 4,000	needed for round pipes
flowmeter	bubbler/reducer	\$ 3,000	for open channels/weirs/flumes
housing, supplies, installation labor		\$ 2,000	plastic garden shed or steel utility box
telemetry option		\$ 8,000	DEM system, cell phone uplink